

1 SO. CAL. EQUAL ACCESS GROUP
2 Jason J. Kim (SBN 190246)
3 Jason Yoon (SBN 306137)
4 101 S. Western Ave., Second Floor
5 Los Angeles, CA 90004
6 Telephone: (213) 205-6560
7 cm@socaleag.com

8 Attorneys for Plaintiff
9 MARQUISE BAILEY

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 MARQUISE BAILEY,

13 Plaintiff,

14 vs.

15 G&A BUSINESSES LLC; RADCO
16 INVESTMENTS; and DOES 1 to 10,
17 Defendants.

Case No.: 2:25-cv-00115

**NOTICE OF VOLUNTARY
DISMISSAL OF ENTIRE ACTION
WITHOUT PREJUDICE**

18 **PLEASE TAKE NOTICE** that MARQUISE BAILEY (“Plaintiff”) pursuant to
19 Federal Rule of Civil Procedure Rule 41(a)(1) hereby voluntarily dismisses the entire
20 action *without prejudice* pursuant to Federal Rule of Civil Procedure Rule 41(a)(1) which
21 provides in relevant part:

22 **(a) Voluntary Dismissal.**

23 (1) *Without a Court Order.* Subject to Rules 23(e), 23.1(c), 23.2, and 66
24 and any applicable federal statute, the plaintiff may dismiss an action
25 without a court order by filing:

26 (i) A notice of dismissal before the opposing party serves either an
27 answer or a motion for summary judgment.
28

1 None of the Defendants has either answered Plaintiff's Complaint, or filed a motion for
2 summary judgment. Accordingly, this matter may be dismissed without an Order of the
3 Court.

4
5 DATED: October 10, 2025

SO. CAL. EQUAL ACCESS GROUP

6
7
8 By: /s/ Jason J. Kim
9 Jason J. Kim, Esq.
10 Attorneys for Plaintiff
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28